

1 Honorable Marsha J. Pechman  
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IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 AYANNA ROSENBERG, individually, and on  
11 behalf of all those similarly situated,

12 Plaintiff,

13 v.

14 CCS COMMERCIAL, L.L.C., (d/b/a Credit  
15 Collection Services Commercial), and  
PROGRESSIVE DIRECT INSURANCE  
COMPANY,

16 Defendants.

17 Pursuant to LCR 7(d)(1), LCR 10(g), and the Court's Chamber Procedures, plaintiff Ayanna  
18 Rosenberg, defendants CCS Commercial, LLC ("CCS"), and Progressive Direct Insurance Company  
19 ("Progressive"), by and through their counsel, hereby stipulate and move for a three-week  
20 continuance of the discovery deadline.  
21

22 **STIPULATED MOTION**

23 The parties agree and stipulate as follows:

24 The current discovery deadline is May 16, 2018. Plaintiff is scheduled to take a Rule  
25 30(b)(6) deposition of Progressive on May 14, 2018.  
26

STIPULATED MOTION AND [REDACTED] ORDER  
AMENDING CASE SCHEDULE FOR SOLE PURPOSE OF  
CONTINUING ONE OUT-OF-STATE 30(B)(6)  
DEPOSITION OF PROGRESSIVE (2:17-CV-00476-MJP) -  
PAGE 1

HOLLAND & KNIGHT LLP  
2300 US Bancorp Tower  
111 SW Fifth Avenue  
Portland, OR 97204  
Telephone: 503.243.2300

1       Based on the parties' schedules and ongoing settlement negotiations, the parties have agreed  
2 to postpone the deposition of Progressive. The parties believe that a three-week continuance of the  
3 discovery deadline will provide sufficient time for plaintiff to complete the deposition of Progressive  
4 without disrupting the remaining case schedule.

5       Accordingly, the parties agree and stipulate that good cause exists to continue the discovery  
6 deadline for three weeks, for the sole purpose of completing the deposition of Progressive, to **June**  
7 **6, 2018.**

8       **STIPULATED and AGREED:**

9       Dated this 10th day of May, 2018

10      TOUSLEY BRAIN STEPHENS PLLC

11      By: /s/ Chase Alvord

12           Chase Alvord, WSBA No. 26080  
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19      *Attorney for Plaintiff Ayanna Rosenberg,  
20           individually, and on Behalf of all those  
21           similarly situated*

22      BULLIVANT HOUSER BAILEY PC

23      By: /s/ Matthew J. Sekits

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28      *Attorneys for Defendant  
29           CCS Commercial, LLC*

30      HOLLAND & KNIGHT

31      By: /s/ J. Matthew Donohue

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36      *Attorneys for Defendant Progressive Direct  
37           Insurance Company*

38      STIPULATED MOTION AND [REDACTED] ORDER  
39      AMENDING CASE SCHEDULE FOR SOLE PURPOSE OF  
40      CONTINUING ONE OUT-OF-STATE 30(B)(6)  
41      DEPOSITION OF PROGRESSIVE (2:17-CV-00476-MJP) -  
42      PAGE 2

43      **HOLLAND & KNIGHT LLP**  
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## ORDER

Pursuant to the above stipulated motion, and good cause appearing, it is so ordered that the discovery deadline is extended to **June 6, 2018**, for the sole purpose of completing the deposition of Progressive, and that the Case Schedule be amended as indicated.

DATED this 11<sup>th</sup> day of May, 2018.

\_\_\_\_\_, 2018.  
Marsha J. Pechman  
The Honorable Marsha J. Pechman  
United States District Judge

The Honorable Marsha J. Pechman  
United States District Judge

**STIPULATED MOTION AND [REDACTED] ORDER  
AMENDING CASE SCHEDULE FOR SOLE PURPOSE OF  
CONTINUING ONE OUT-OF-STATE 30(B)(6)  
DEPOSITION OF PROGRESSIVE (2:17-CV-00476-MJP) -  
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1 CERTIFICATE OF SERVICE

2 I hereby certify that I caused the foregoing STIPULATED MOTION AND [PROPOSED]  
3 ORDER AMENDING CASE SCHEDULE FOR SOLE PURPOSE OF CONTINUING ONE OUT-  
4 OF-STATE 30(B)(6) DEPOSITION OF PROGRESSIVE to be served on the following person[s]:

5 Chase Christian Alvord  
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11 Attorneys for Defendant CCS Commercial LLC

12 Attorneys for Plaintiff

13 by causing the document to be delivered by the following indicated method or methods:

14  by CM/ECF electronically mailed notice from the Court on the date set forth below.

15  by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes,  
16 addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of  
the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon,  
on the date set forth below.

17  by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their  
18 attorneys at their last-known office addresses listed above on the date set forth below.

19  by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid  
envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office  
addresses of the parties and/or their attorneys, on the date set forth below.

20  by faxing full, true, and correct copies thereof to the fax machines which are the last-known fax  
21 numbers for the parties' and/or attorneys' offices, on the date set forth below.

22 DATED May 10, 2018.

23  
24 /s/ Kristin M. Asai  
25 Kristin M. Asai  
26

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CERTIFICATE OF SERVICE – PAGE 1